

CGB CC-0188

Catholic Communications Corporation

65 Elliot Street P.O. Box 1730

Springfield, Massachusetts 01101-1730

Tel: 413-737-4744 Fax: 413-747-0273 Internet: www.diospringfield.org

December 29, 2005

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street SW
Washington, DC 20554

RECEIVED & INSPECTED

DEC 30 2005

FCC - MAILROOM

RE: Supplemental information regarding Catholic Communications Corporation
Waiver Petition "Closed Captioning" / Dec. 22, 2005

This letter is provided to clarify the Dec. 22, 2005 request by Catholic Communications Corporation of Springfield, Massachusetts for a temporary waiver from the pending "Closed Captioning" regulations.

The foundation of our request is based upon the **undue burden (47 C.F.R. § 79.1 (f)) exemption**. In my Dec. 22nd request I clearly outline the financial burden and lack of funding currently available to comply with these regulations. These difficulties were made worse by the extremely late notification by our broadcaster, WWLP Springfield Mass. of their intention to assign responsibility to programmers. As provided in my initial filing that notice came just 12 weeks ago – an incredible burden on a small communication facility with limited resources.

Based on information available on your website I would cite the following areas as all being applicable to our request and supported by my previous filing.

- The nature and cost of the closed captioning for the programming
- The impact on the operation of the provider or program owner
- The financial resources of the provider or program owner, including efforts to solicit captioning assistance from the distributors of its programming and the distributors' responses
- The type of operations of the provider or program owner
- Any available alternatives that might constitute a reasonable substitute for the closed captioning requirements, including but not limited to, text or graphic display of the content of the audio portion of the programming
- Other factors the petitioner deems relevant to the Commission's final determination.

In addition, it is our belief that our Sunday Mass program *The Chalice of Salvation* has no repeat value ever based on unique liturgical calendar that alternates readings and prayers.

I wish to reiterate that we are actively seeking to resolve this issue and therefore are only seeking a short-term waiver through August 31, 2006. I hope this clarifies my earlier filing.


Mark E. Dupont
Chief Executive Officer

MED

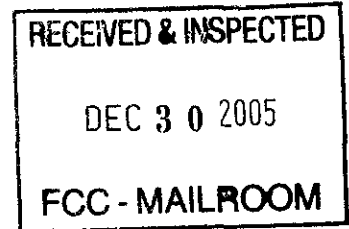
063-CC-0158

Catholic Communications Corporation

65 Elliot Street P.O. Box 1730

Springfield, Massachusetts 01101-1730

Tel: 413-737-4744 Fax: 413-747-0273 Internet: www.diospringfield.org



M E M O R A N D U M

December 28, 2005

TO: FCC
FROM: Mark Dupont / Catholic Communications

RE: FCC Filing

Attached is a copy of our petition for a temporary waiver from the Closed Captioning requirements.

This may be a duplicate filing as we previously sent an identical package via Fed Exp to an address in Maryland that proved incorrect. Fed Express has promised to re-direct that package, but given the limited time, we have chosen to re-send this as well.

I would greatly appreciate confirmation of receipt. My phone number is 413 478-8516.

Thank-you.

CCBCC-0158

Catholic Communications Corporation

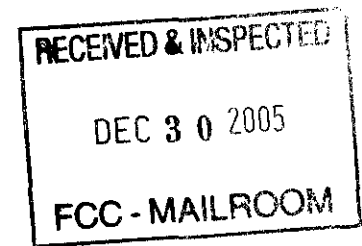
65 Elliot Street P.O. Box 1730

Springfield, Massachusetts 01101-1730

Tel: 413-737-4744 Fax: 413-747-0273 Internet: www.diospringfield.org

December 22, 2005

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street SW
Washington, DC 20554



RE: Waiver Petition "Closed Captioning"

The Catholic Communications Corporation (CCC) of Springfield, Massachusetts is a non-profit Catholic religious media publication and broadcast programmer. We are a separate non-profit 501 (C) (3) entity from the Roman Catholic Diocese of Springfield. As part of our broadcast mission we produce two television programs weekly, a half-hour news magazine style program (*Real to Reel*) and a one hour broadcast of the Sunday Catholic Liturgy (*Chalice of Salvation*), both which are broadcast on WWLP, Springfield, MA.

Real to Reel is a news style program, based solely on local coverage of Church related news and public interest stories. It is broadcast only within this broadcast market with the exception of a copy provided to an ITFS system in Boston, the Boston Catholic Television Network.

The Chalice of Salvation is the weekly broadcast of our Sunday liturgy. Because of the unique nature of Catholic liturgy and how it intersects with the secular calendar, there is no repeat value to the Mass. Each week is unique to that date and can never be repeated. This program is only broadcast on WWLP in this market.

These programs, as attested by the attached letter from Sr. Eileen Sullivan, serve as a critical link between our Catholic population, especially the infirmed and homebound, and their Church. Any disruption in our ministry would be devastating for these viewers as there is no local alternative and they would, in fact, be adversely impacted.

On September 23, 2005 we were informed by WWLP that, upon review of their attorneys, were assigning to all program originators, the responsibility to comply with the pending FCC requirement for full closed captioning. Given this short notice, the financial limitations of our ministry, and the nature of our programming we are requesting a temporary waiver from these new requirements to cover a period through August 31, 2006. This waiver would protect those that carry our programming through the requested waiver period from any fines and adverse actions related to our programs, while granting us the needed time to make financial preparations and properly install a reliable closed captioning system.

CCC is a very small media operation, especially given the diverse scope of our work. We employ only six fulltime and seven regular part-time employees. Another 15 per diem members supplement our staff, but that also includes those working on our bi-weekly newspaper and websites. Our total operation budget (July 1, 2005-June 30, 2006) is \$930,000 for all our media work, print and broadcast, *that represents a 12% cut from the previous year* – which itself had been level funded even though many of our core costs including air time have steadily increased in line with “cost of living” factors. Only half of that funds our television operations, the remainder is for our print, internet and radio ministries. In addition, 66% of the overall amount funds in our budget are for personnel costs.

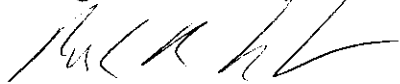
Our revenues come from free will offerings (7%) and subscriptions/services/fees (33%) with our key financial assistance coming from grants from the Roman Catholic Diocese of Springfield, 60% of our total revenue. Because of this, our finances have been negatively impacted in recent years because of the crisis facing the Church and slow economic growth in our region. A letter from the Finance Officer of the Diocese, Mr. William LaBroad is attached. Because of these factors, and the September notification by our broadcast outlet (WWLP), we have been unable, as of this date, to comply with the regulations by the January 1 deadline. We are, however, committed to coming into compliance at the earliest possible date, and to that end have already begun planning and research.

This research indicates that given our ongoing television ministry and regular programming we should purchase a system. The system that best addresses our needs and provides dependable closed captioning would cost approximately \$15,000 - \$20,000 (purchase and installation) with an additional operational staffing expense of approximately \$25,000 annually. Given the extremely limited finances available, even this amount would force us to temporarily stop broadcasting our programs that would be a tremendous loss for our audience, many who are elderly shut-ins and for which this is their only local spiritual connection to their Catholic faith.

CCC is not requesting an indefinite waiver. We are petitioning for a waiver *only through the first part of 2006* so that we can solicit financial assistance to underwrite these costs, as well as install, and properly train on a system that meets our needs. We have been in communication with representatives of former viewer’s trust fund, and feel we will have the amount needed to begin this implementation in early 2006.

I would hope the FCC would see these as good faith efforts towards compliance and would grant our waiver as requested through August 31, 2006.

With gratefulness for your consideration of this request,



Mark E. Dupont
Chief Executive Officer

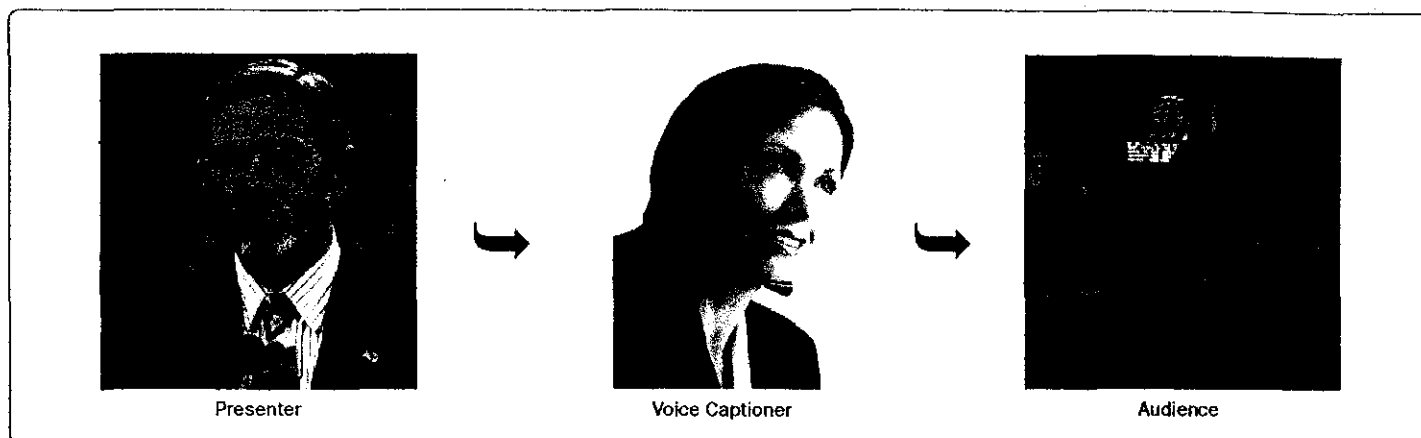
MED

CC: USCCB Legal Counsel, Bill Pepin/ WWLP

Enc.

CAPTION MIC™ *Live Event*

Voice Generated Captioning



Features

- Real-time captions by voice
- Simultaneous open and closed captions
- Transcription text available

Use Caption Mic *Live Event* for

- Meetings
- Lectures
- Ceremonies
- Speeches

Caption Mic is ideally suited for

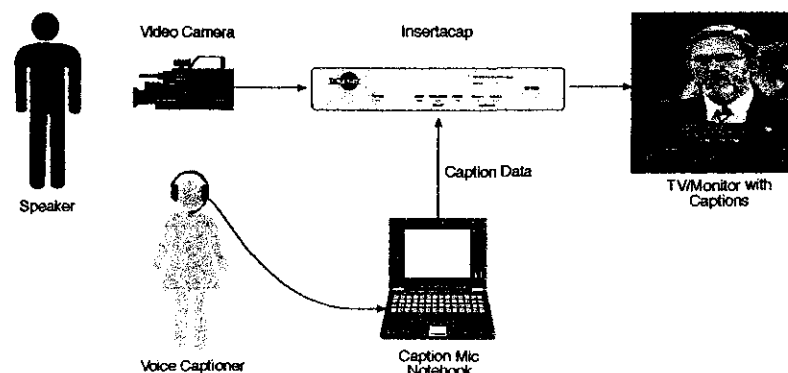
- Federal, state, and local government
- Colleges and universities
- Corporations and other organizations

Introducing Caption Mic

Caption Mic ("Mic" as in "microphone") produces captions with the help of speech recognition technology. A voice captioner echoes what is spoken at an event, and the resulting captions are displayed on a TV monitor. Caption Mic *Live Event* is intended to provide accessibility for public events such as meetings, presentations, lectures, etc. Caption Mic is a cost effective alternative to using sign language or steno-captioning services.

How it works

During an event, a voice captioner respeaks (echoes) the presenter's words into a microphone that is connected to the Caption Mic PC. The Caption Mic software converts the voice captioner's speech into words that are sent to a caption encoder/character generator. The character generator displays the resulting text on a TV monitor or projector. The TV monitor can be positioned for viewing by a segment of the audience in the event room. The voice captioner can be located in the same room as the event or in an adjacent room. For individual or classroom applications, the caption text is displayed on a notebook or PC monitor.



Caption

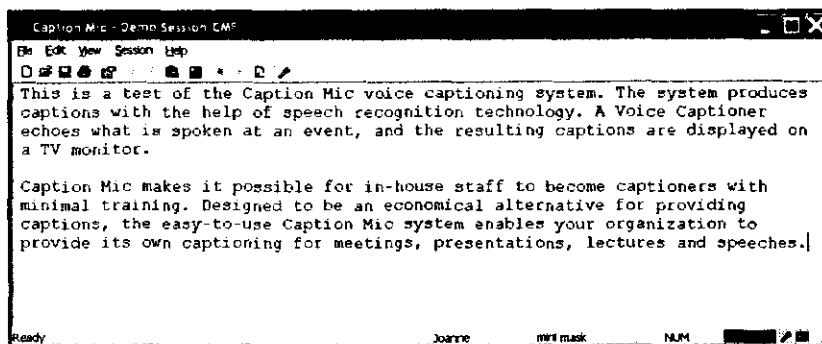
Mic™

Other features

- **Simultaneous open caption display and closed caption encoding**
Enables you to display text captions for the live audience and simultaneously encode closed captions if recording for subsequent playback on a television where the viewer can choose to display captions.
- **User definable caption display attributes for television monitor**
 - mixed case or all upper case text
 - full screen or partial screen
 - 2, 3, 4 or 15 line roll-up text display
 - left, center, right justification
 - 4, 8, 12, 16, 20, 24, 28, 32 character row width
- **Real-time keyboard access for inserting punctuation while voice captioning**
Allows captioner to insert punctuation marks without disrupting the flow of their voice captioning.
- **Real-time text substitution keys**
Enables you to insert user-defined text such as proper names, phrases, descriptions, etc. into the caption text. The key definitions can be set up prior to a voice captioning session. For example, the text "Massachusetts Institute of Technology" can be assigned to the F9 key. Each time F9 is pressed, "Massachusetts Institute of Technology" is displayed.
- **Text transcript and voice audio saved for each Caption Mic session**
Enables you to print, edit, or export transcript text. Allows you to play back your voice audio.
- **Multiple captioners with one Caption Mic system**
Share one system among many users. Allows two or more voice captioners to switch during long events.
- **CD backup of valuable data files**
Enables safe and easy backup of users' voice model and vocabulary files.
- **Post production capability**
ULTECH's optional "Caption Wrap" software enables you to edit and encode Caption Mic data files for archived or distributed videotape productions.
- **Color coded cable connectors**
Facilitates fast, easy hook-up.

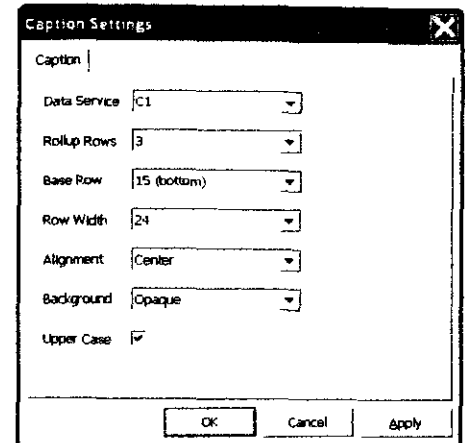
Caption Mic is affordable

Caption Mic enables anyone in your organization to become a voice captioner with a minimum of training. Voice captioning eliminates the need for highly trained and specialized stenographers and interpreters.

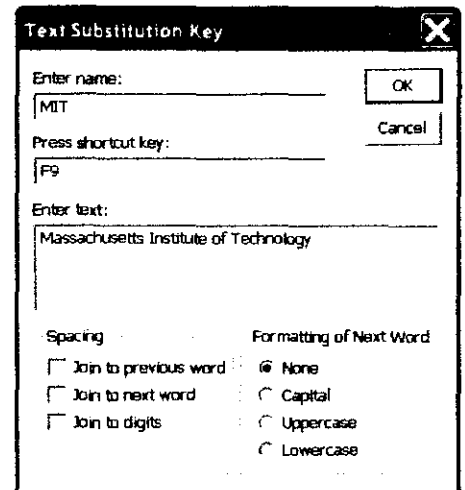


Main application window

Sample menus



Caption display settings



Defining a Text Substitution Key

Benefits

Captioning for the hard of hearing and deaf community is expanding its reach in order to give equal access to live events at any venue. Section 508, an amendment to the Rehabilitation Act, enacted by the U.S. Federal Government, has mandated that the hard of hearing have equal accessibility to electronic media and information technology, through the production and use of advanced technology within Federal agencies. Caption Mic enables access within budget constraints of organizations and is a lower cost solution compared to contracting with outside services.

Caption Mic *Live Event* comes with –

Notebook and accessories

Custom configured notebook PC that meets all the requirements to run Caption Mic software. Runs the Caption Mic software and feeds caption data to the display device (Insertacap/TV monitor).

Caption Mic software

Real-time voice generated caption display software.

Insertacap

Overlays "open" caption text on background video for display on a TV monitor. Also inserts "closed" caption data into video signal.

Sylencer mask microphone

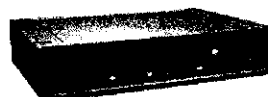
A microphone embedded in a soft rubber acoustic shield. The shield helps prevent ambient noise from entering the microphone while at the same time attenuates the captioner's voice into the room. Normally used when voice captioner is located in or near the audience.

CD-RW disks

Two preformatted CDs for backing up data.

Cables, adapters, Quick Start Guide, User's manual on CD

Everything you need to interconnect and operate the various Caption Mic components.



Options

Andrea headset microphone

Contains a microphone to pick-up captioner's voice. Also contains an ear-piece for monitoring audio. Normally used when voice captioner is located remotely such as off-stage or in a nearby room.

Video camera and accessories

Provides an image of the event on a TV monitor.

Tripod for video camera

Provides stable support for video camera.

Caption Pac

Ergonomically designed carrying case with wheels for transporting Caption Mic system. Dimensions: 16" W x 12" D x 25" H. Weight: 24 lbs.

Caption Wrap

Post production software that enables you to create videotape productions from your Caption Mic sessions. Provides editing and line 21 caption encoding capability in conjunction with a closed caption encoder.



Foam padded Caption Pac



Ordering Information

Choose either English or Spanish language. Additional languages, desktop headset microphones may be ordered separately.

CM-Live-Engl	Caption Mic Live Event package, English.....	\$7,695
CM-Live-Span	Caption Mic Live Event package, Spanish.....	7,695
OPT30-2	Additional Sylencer Mask.....	169
OPT31	Andrea headset.....	80
OPT32	English language.....	1,850
OPT33	Spanish language.....	1,850
OPT35	CCTV Video Camera lens.....	160
OPT36	Tripod.....	35
Cap-Pac	Caption Pac foam padded carrying case.....	175
Cap-Wrap	Caption Wrap post production software.....	2,100

Warranty: one year parts and labor

Toll Free Order Hotline

888-360-0010

Prices, specifications / features subject to change without notice.

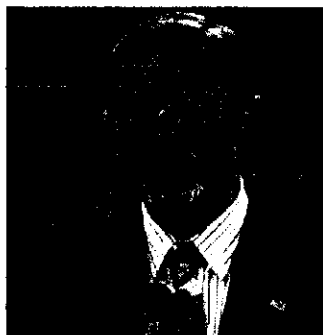
ULTECH Inc. 1255 Middlebury, Middlebury, CT 06762 USA

Tel: 203-758-8667, Fax: 203-758-8693, www.ultech.com

An NCI Foundation Company

CAPTION MIC™ Broadcast

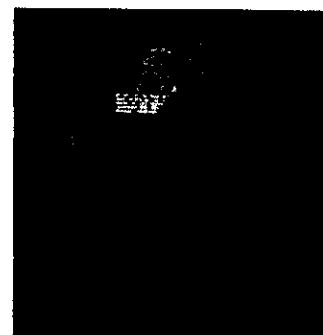
Voice Generated Real-time Closed Captioning



Anchor/Reporter



Voice Captioner



Audience

Features

- Real-time captions by voice
- Significant cost saving over traditional methods
- Improved accuracy by pre-analyzing program material
- Transcription text available

Use Caption Mic for

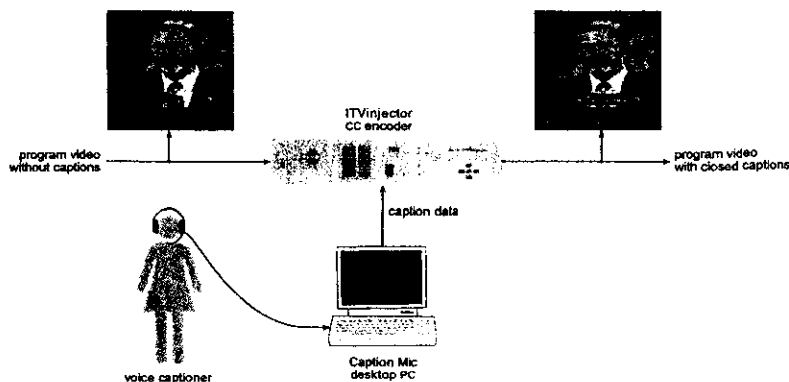
- Local news
- Locally produced shows
- Emergency announcements

Introducing Caption Mic for broadcast applications

Caption Mic ("Mic" as in "microphone") produces captions with the help of speech recognition technology. A voice captioner echoes the dialog of a TV program, and the resulting captions are encoded into line 21 of the vertical blanking interval. Caption Mic is a cost effective alternative to using steno-captioning services.

How it works

During a program, a voice captioner respeaks (echoes) the dialog/narrative into a microphone that is connected to the Caption Mic PC. The Caption Mic software converts the voice captioner's speech into words that are sent to ULTECH's ITVinjector closed caption encoder. The encoder inserts the closed caption data into the program video. The ITVinjector can simultaneously encode XDS data (Vchip, Program IDs, etc.).

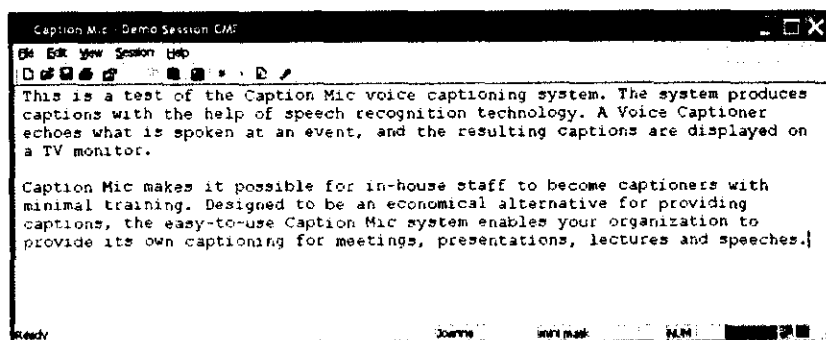


Caption

Mic™

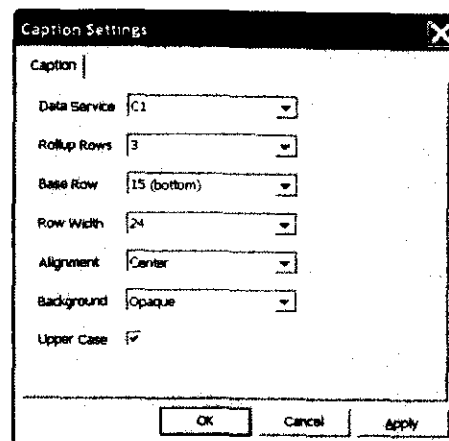
Other features

- **Simultaneous *open* caption display and *closed* caption encoding**
Enables you to display text captions for the live audience and simultaneously encode closed captions if recording for subsequent playback on a television where the viewer can choose to display captions.
- **User definable caption display attributes for television monitor**
 - mixed case or all upper case text
 - full screen or partial screen
 - 2, 3, 4 or 15 line roll-up text display
 - left, center, right justification
 - 4, 8, 12, 16, 20, 24, 28, 32 character row width
- **Real-time keyboard access for inserting punctuation while voice captioning**
Allows captioner to insert punctuation marks without disrupting the flow of their voice captioning.
- **Real-time text substitution keys**
Enables you to insert user-defined text such as proper names, phrases, descriptions, etc. into the caption text. The key definitions can be set up prior to a voice captioning session. For example, the text "Massachusetts Institute of Technology" can be assigned to the F9 key. Each time F9 is pressed, "Massachusetts Institute of Technology" is displayed.
- **Text transcript and voice audio saved for each Caption Mic session**
Enables you to print, edit, or export transcript text. Allows you to play back your voice audio.
- **Multiple captioners with one Caption Mic system**
Share one system among many users. Allows two or more voice captioners to switch during long events.
- **CD backup of valuable data files**
Enables safe and easy backup of users' voice model and vocabulary files.
- **Post production capability**
ULTECH's add-on "Caption Wrap" software enables you to edit and encode Caption Mic data files for archived or distributed videotape productions.
- **Voice captioner connects to encoder via LAN**
Allows operator to be remotely located.

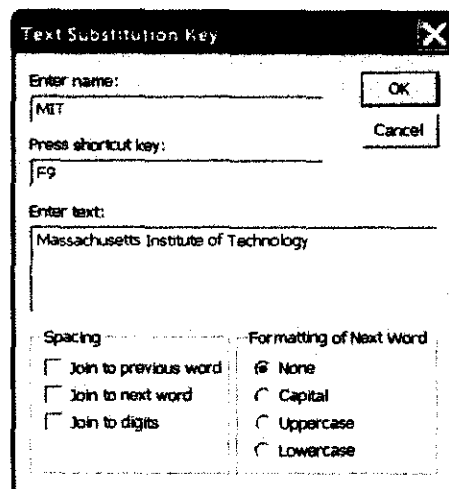


Main application window

Sample menus



Caption display settings



Defining a Text Substitution Key

Benefits

Caption Mic enables anyone in your organization to become a voice captioner with a minimum of training. Voice captioning eliminates the need for highly trained and specialized stenographers and real-time captioners. Because the voice captioner may be located in your studio, you save the expense of having two long distance phone lines open for the duration of the show (one to feed audio and one to receive data).

Caption Mic *Broadcast* comes with –

Desktop PC and accessories

Custom configured desktop PC that meets all the requirements to run Caption Mic *Broadcast*. The PC runs the Caption Mic software and feeds caption data to the line 21 caption encoder (the ITVinjector).

Caption Mic software

Real-time voice generated caption display software.

ITVinjector

Encodes line 21 closed caption data into the VBI of the program video signal. Receives caption data via LAN. Also has inputs for newswire computer feeds.

Andrea headset

Contains a microphone to pick-up captioner's voice. Also contains an ear-piece for monitoring program audio.

CD-RW disks

Two preformatted CDs for backing up data.

Cables, adapters, Quick Start Guide, User's manual on CD

Everything you need to interconnect and operate the various Caption Mic components.



Options

Caption Wrap

Post production software that enables you to create videotape productions from your Caption Mic sessions. Provides editing and line 21 caption encoding capability in conjunction with a closed caption encoder.



Who we are

ULTECH is a developer of innovative products that improve the accessibility of media and communications through technology. Applications addressed by the company include closed captioning, subtitling, voice captioning, and Interactive TV. Founded in 1991, ULTECH operated as an independent company until 2002 when it became a wholly owned company of the National Captioning Institute Foundation. ULTECH markets primarily to the government, education, broadcast, post production and media services industry.

Voice captioning roadmap

ULTECH is committed to continually developing and improving Voice Captioning technology. The company plans to release several significant enhancements to the Caption Mic system over the next few years.

Ordering Information

Choose either English or Spanish language. Additional languages or headset microphones may be ordered separately.

CMI-broad-Engl	Caption Mic Broadcast package, English	\$10,695
CMI-broad-Span	Caption Mic Broadcast package, Spanish	10,695
OPT31	Additional Andrea headset	80
OPT32	English language add-on	1,850
OPT33	Spanish language add-on	1,850
Cap-Wrap	Caption Wrap post production software	2,100

Warranty: one year parts and labor

Toll Free Order Hotline

888-360-0010

ULTECH LLC, 1255 Middlebury Road, Middlebury, CT 06762 USA
Tel: (203) 758-8667, Fax: (203) 758-8693, www.ultech.com

Prices, specifications / features subject to change without notice.

An NCI Foundation Company



September 22, 2005

Mr. Mark Dupont
Catholic Communications Corp.
65 Elliot Street
Springfield, MA 01105

Dear Mark:

The Federal Communications Commission has enacted new rules that will dramatically affect all locally produced television programs, with few exceptions. Effective January 1, 2006, all television programs must be closed or open captioned. I believe these new rules will apply to both Chalice of Salvation and Real to Reel. I am enclosing a copy of the FCC rules for your review. There is a provision within the FCC rules that allows for exemptions. Assuming you would want to apply for an exemption, I contacted our Washington, D.C. legal department. The legal staff does not believe Chalice of Salvation or Real to Reel qualifies for an exemption. Perhaps your legal advisors are of a different opinion. The exemption process is detailed in the attached FCC document.

Absent an FCC exemption, it will be necessary to close or open caption both Chalice of Salvation and Real to Reel by January 1, 2006. WWLP has taken the position that it will be the responsibility of the program producer to provide the captioning. We are in the process of contacting all syndicators and program producers to ensure all programming supplied to WWLP will comply with the new FCC rules.

This new FCC ruling is extremely burdensome to both program suppliers and television stations. You might argue the new rules are totally unreasonable. We hoped common sense would prevail in Washington and the rules would either be suspended or delayed. Unfortunately, this has not happened, therefore, we must make the necessary plans to comply.

Perhaps after you have had a chance to review the attached FCC material, we can either meet in person or talk via telephone.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Pepin", written over the word "Sincerely,".

William M. Pepin
Vice President & General Manager

Enclosure

St. Michael's Cathedral
260 State Street
Springfield, Massachusetts 01103

December 22, 2005

Dear Federal Communications Commissioners,

As a Pastoral Outreach Minister for the past fourteen years, I am writing this letter to express, my feelings about the impact that the Catholic Communications programming has on the elderly and homebound.

I have experienced first hand the contribution that Chalice of Salvation and Real to Reel have made on the lives of the elderly. For many they are the only connection the people have with their Church and the life of the parish. I often hear them say "I just went to Mass in my own home. I feel so close to God." "I look forward to Sunday mornings."

Catholic Communications programming brings life and a sense of belonging to people who are physically disabled and the elderly. Many who are in nursing homes and hospitals depend on this form of communication. It makes their day, fills the night and is a valuable service to our community.

On behalf of the elderly, the homebound, the hospitalized and those in nursing homes, I ask that you strongly support the Catholic Communication Waver.

Thank you for considering this most important matter.

Sincerely,



Sr. Eileen Sullivan
Pastor Outreach Minister
St. Michael's Cathedral

Diocese of Springfield
65 Elliot Street - P.O. Box 1730
Springfield - Massachusetts 01102

OFFICE FOR FISCAL AFFAIRS

Tel: (413) 452-0687
Fax: (413) 785-5449

December 22, 2005

Mr. Mark Dupont, CEO
Catholic Communications Corporation
65 Elliot Street
Springfield, MA 01103

Re: Catholic Communications Corporation
Additional Funding Requirement

Dear Mark:

You have indicated a potential need for additional grants from the Roman Catholic Bishop of Springfield, a corporation sole to the Catholic Communications Corporation in order to meet closed captioning requirements of the Federal Communications Commission.

While I empathize with the fact that the Chalice of Salvation reaches elderly and disabled viewers who cannot attend Mass, please recall the financial environment we are facing:

- Employees did not receive wage increases for this fiscal year at July 1, 2005.
- Diocesan departments and affiliated organization budgets were reduced 18% across the board.
- A hiring freeze is in effect.
- The just completed Annual Catholic Appeal's contribution to Diocesan departments and affiliated organizations will be \$200,000 less than budgeted for the current fiscal year.

Based upon these constraints, I cannot recommend additional funding be made available to the Catholic Communications Corporation.

Sincerely,



William F. LaBroad, Jr.
Finance Officer

Catholic Communications Corporation Budget Request Summary 2005-2006

[illegible]

Total Revenue	\$930,230	\$11,750	\$13,250	\$17,500	\$30,000	\$78,500	\$46,000	\$25,000	\$19,000	\$19,000	\$33,500	\$20,500	\$39,000
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EXPENSES

Office & Administrative

52010	Telephone	\$8,000	500	500	800	700	800	900	600	600	600	800	700	500
52030	Office Supplies	\$4,000	200	200	400	400	500	500	300	300	300	300	300	300
52990	Miscellaneous Office Expense	\$2,000	165	165	165	165	165	175	165	165	165	165	165	175
55150	Other Printing Expense	\$2,000			750	750							500	
55200	Binding Expense	\$250		250										
55220	Directory Printing Cost	\$11,000								11,000				
	Observer Printing	\$80,000	4000	4000	4000	4000	4000	4000	20000	4,000	4000	4000	20000	4000
55300	Postage - Metered													
55302	Postage - Second Class	\$18,000	3000		3000		3000		3000		3000		3000	
55304	Postage - Federal Express	\$1,000		100	100	100	100	100	100	100	100	100	100	
55306	Postage - Miscellaneous	\$5,000	200	50	50	300	2000	100	50	50	2000	50	50	100
	Courier Service	\$1,800			600			600				600		
55800	Diocesan Advertising Expense													
	<i>Subtotal of Office & Administrative</i>	\$133,050	\$8,065	\$5,265	\$9,865	\$6,415	\$10,565	\$5,775	\$24,215	\$16,215	\$10,165	\$5,415	\$24,815	\$5,075

Professional Services

[illegible]

56015 Prog. Exp. - Airtime - Voz Catolica
56020 Prog. Exp. - Feature Svcs.
56030 Prog. Exp. - Catholic News Serv.
56050 Prog. Exp. - Radio / TV Ads

\$8,100	675	675	675	675	675	675	675	675	675	675	675	675	675
\$250	20	20	20	20	20	20	20	20	20	20	20	20	20
\$12,000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000
\$1,000					500			500					

Catholic Communications Corporation
Budget Request Summary 2005-2006
Page 2

Expenses Continued		FY 2006												
Acct #	Description	Total Request	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June
56060	Prog. Exp. - Print Advertising	\$1,000							500	500				
56070	Prog. Exp. - Feature TV Segments	\$500			250				250					
	Program Expense - Iobserve	\$480	40	40	40	40	40	40	40	40	40	40	40	40
56080	Program Expense - Diocesan Web Site													
56100	Production Exp. - Fees	\$5,000	500						3000	1500				
56110	Prod. Exp. - Tapes, Props, Materials	\$4,000	350	250	350	350	350	350	350	350	350	350	350	250
56300	Professional Services (outside)	\$25,000	1000	2000	2000	2000	2000	3000	2000	2000	3000	2000	2000	2000
56400	Commissions													
56900	Other Program Expense	\$1,020	85	85	85	85	85	85	85	85	85	85	85	85
	Subtotal Professional Services	\$131,850	\$11,545	\$9,445	\$9,795	\$11,545	\$10,045	\$10,545	\$13,295	\$12,045	\$13,545	\$11,045	\$9,545	\$9,445
	Repair & Maintenance													
54020	R & M - Equipment	\$15,000	3000	1000	1000	1000	1000	1000	1000	1000	2000	1000	1000	1000
54030	Property Insurance	\$3,180	265	265	265	265	265	265	265	265	265	265	265	265
	Subtotal Repair & Maintenance	\$18,180	\$3,265	\$1,265	\$1,265	\$1,265	\$1,265	\$1,265	\$1,265	\$1,265	\$2,265	\$1,265	\$1,265	\$1,265
	Travel & Conferences													
57000	Mileage Reimbursement - Staff	\$600		60	60	60	60	60	60	60	60	60	60	
57002	Mileage Reimbursement - Freelance	\$600		60	60	60	60	60	60	60	60	60	60	
57010	Gasoline	\$2,500	220	150	150	220	220	220	220	220	220	220	220	220
57020	R & M - Auto	\$3,500	500			1000			1000			1000		
57030	Insurance and Registration Exp.	\$2,000	150	150	150	150	150	350	150	150	150	150	150	150
57040	Parking & Tolls Reimbursement	\$250		10	24	24	24	24	24	24	24	24	24	24
57050	Convention/Course Fees/Registr Expenses													
57070	Accommodations													
57080	Airfare													
57090	Miscellaneous Travel Expenses													
	Subtotal Travel & Conferences	\$9,450	\$870	\$430	\$444	\$1,514	\$514	\$714	\$1,514	\$514	\$514	\$1,514	\$514	\$394
	Publications & Memberships													
57100	Publications Expense	\$1,000		200	80	80	80	80	80	80	80	80	80	80
57110	Memberships Expense	\$1,000		500				500						
	Subtotal Publications & Memberships	\$2,000		\$700	\$80	\$80	\$80	\$580	\$80	\$80	\$80	\$80	\$80	\$80
	Miscellaneous Expenses													
58000	Corporate Fundraising Expense	\$4,000						2000			2000			
59110	Bank Fees	\$400		30	30	30	30	30	30	30	30	30	50	50
59200	Bad Debts Expense	\$200												
	Subtotal Misc. Expenses	\$4,600		\$30	\$30	\$30	\$30	\$2,030	\$30	\$30	\$2,030	\$30	\$50	\$50

Capital Expenditures

59300	Purchase Of Equipment	\$15,000		5000			5000					5000		
59310	Purchase of Furniture	\$500				500								
59350	Leasehold Improvements													
59370	Purchase of Software	\$1,500		500			500					500		
Subtotal Capital Expend.		\$17,000		\$5,500		\$500	\$5,500					\$5,500		
Total Non-Personnel Expenses		\$316,130	\$23,745	\$22,635	\$21,479	\$21,349	\$27,999	\$20,909	\$40,399	\$30,149	\$28,599	\$24,849	\$36,269	\$16,309

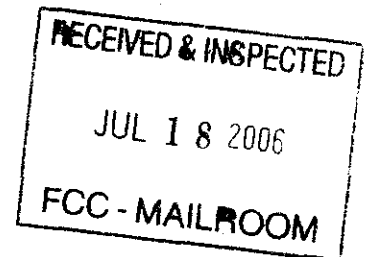
<i>Expense Summary & Prioritization</i>	FY 2006 Total Request	Rank 1 to 9	% Available for Reduction
Office & Administrative	\$133,050		
Professional Services	\$131,850		
Repair & Maintenance	\$18,180		
Travel & Conferences	\$9,450		
Publications & Memberships	\$2,000		
Miscellaneous Expenses	\$4,600		
Capital Expenditures	\$17,000		
Total of Non-Personnel Expenses	\$316,130		

Rank = 1 to 9, 1 being most important; hence, reduce last

% Available for Reduction

The purpose of the "% Available for Reduction" column is to give department heads greater flexibility to identify categories where additional reductions may be applied, if needed. For instance, if you rank capital expenditures as 9, but you have some equipment items that you feel must be purchased, then by putting in a percentage, you can indicate that you don't want 100% of your least important category reduced or eliminated.

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July 12, 2006

Amelia Brown, Disability Rights Office
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: CGB-CC-0158

Please be informed that all broadcast programs, produced by the Catholic Communications Corporation of Springfield Massachusetts, including but not limited to the programs "Real to Reel" and "The Chalice of Salvation" both broadcast on WWLP, Channel 22 Springfield Massachusetts, are in compliance with closed captioning requirements.

Regards,

Mark E. Dupont
Chief Executive Officer

MED

cc: Bill Pepin/WWLP, Katherine Grincewich/USCCB